

**Before the  
FEDERAL COMMUNICATIONS COMMISSION**

**Washington, DC**

In Response to )  
 )  
*Request for Reconsideration Concerning* )  
*Lifeline Broadband Providers* ) WC Docket Nos. 09-197, 11-42

March 16, 2017

**COMMENTS OF THE CITY OF CHICAGO**

The City of Chicago submits these Comments in response to the Federal Communications Commission (FCC) *Request for Reconsideration Concerning Lifeline Broadband Providers* published on March 2, 2017 seeking comments on the modernized Lifeline Program and provider eligibility for that Program.

Chicago is dedicated to digital inclusion — closing gaps in access to digital learning, access to hardware, and access to the Internet.<sup>1</sup> While information collected from city service locations, libraries, and nonprofits indicate that there are over 250 locations in Chicago where residents can access computers and Internet services for free,<sup>2</sup> at-home broadband remains an obstacle. Further, demand for public Internet services has only increased,<sup>3</sup> as both wireline and wireless services continue to remain as budgetary challenge for many families. American Community Survey Data from 2015 revealed over 220,000 households in Chicago, about one in five, still lack broadband.<sup>4</sup> This gap has implications for job seeking, homework success, civic participation, and accessing public support and services. Unfortunately, these data also indicate that households offline are more likely to be households of color, households with lower incomes, and households with lower educational attainment.

Chicago has a long history of leadership and innovation in digital skills and connectivity. Between 2010 and 2013, federal investment through the National Telecommunications & Information Administration's Broadband Technology Opportunities Program was critical to enabling Chicago to make major strides in expanding and evaluating digital access and skills programming.

---

<sup>1</sup> See Chicago Tech Plan <http://techplan.cityofchicago.org/> & Connect Chicago <http://connectchicago.org>

<sup>2</sup> See a map of locations at <http://connectchicago.org/locator>

<sup>3</sup> See Chicago Public Library Wi-Fi usage data for the years 2014-2016 at <http://data.cityofchicago.org>.  
Total number of sessions by year: 2014 – 3,046,636; 2015 – 3,654,843; 2016 – 3,865,634

<sup>4</sup> American Community Survey, 2015

The City of Chicago welcomes any public or private program that helps combat the cost barrier to adopting broadband in the home. Chicago, for instance, continues to benefit from the existence of the Comcast Internet Essentials Program,<sup>5</sup> demonstrating the demand and uptake for low-cost options.

For these reasons identified above, the City of Chicago supports the implementation of the Commission's Lifeline Modernization order released in 2016,<sup>6</sup> which promises to spur innovative companies and programs to bring affordable broadband services to low-income communities.

In this spirit, we encourage the Commission to implement policies consistent with 2016 Modernization Order and resist advice to scale back Lifeline in general. Being inclusive of participating providers increases the geographic regions and eligible Americans benefiting from the Lifeline program and innovative programs that provide not only access, but opportunities for additional skills development. We advise that the Commission overturn the Wireline Competition Bureau's Order on Reconsideration and oppose any effort to stall or reduce the number of eligible Lifeline providers.

**City of Chicago**

**By:** /s/Brenna Berman  
Chief Information Officer & Commissioner

---

<sup>5</sup> *Internet Essentials: Year Four Progress Report*, 2015, See <http://corporate.comcast.com/comcast-voices/internet-essentials-year-four-progress-report>

<sup>6</sup> *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 et al., Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd. 3962, 3984, para. 57 at n.163 (2016).